



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RCH/JP/JS/AXB
F. #2022R01030

*610 Federal Plaza
Central Islip, New York 11722*

September 5, 2023

By ECF

The Honorable Joanna Seybert
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. George Anthony Devolder Santos
Criminal Docket No. 23-197 (JS)

Dear Judge Seybert:

The government respectfully writes in advance of the status conference scheduled in this matter for September 7, 2023 at 12:00 p.m. to request that the Court adjourn the status conference to October 27, 2023 at 10:30 a.m. and enter an order of excludable delay pursuant to Title 18, United States Code, Section 3161(h)(7)(A) from September 7, 2023 through October 27, 2023. The defendant joins in this request.

Since the last status conference in this matter on June 30, 2023, the defendant has continued to review the voluminous discoverable material previously produced by the government and requires additional time to continue reviewing that material. In addition, the government anticipates making another substantial production of discoverable material pursuant to Federal Rule of Criminal Procedure 16 this week. Defense counsel has indicated that he will need additional time to review that material as well. Further, the parties have continued to discuss possible paths forward in this matter. The parties wish to have additional time to continue those discussions.

Accordingly, the parties are jointly requesting that the Court exclude the time from September 7, 2023 through October 27, 2023, to allow defense counsel additional time to review discovery materials and for the parties to continue discussing paths forward in this

matter. See 18 U.S.C. § 3161(h)(7)(A) & (B)(iv) (time is properly excluded when the failure to exclude would deny counsel for the defendant or the attorney for the government the reasonable time necessary for effective preparation). The parties respectfully submit that the ends of justice served by such an excludable delay outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

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cc: Joseph Murray, Esq. (by ECF)
Clerk of the Court (JS) (by ECF)